

Dennis J. Nolan, Esq.
Luma al-Shabib, Esq.
Beth D. Simon, Esq.
ANDERSON KILL P.C.
1251 Avenue of the Americas
New York, New York 10020
(212) 278-1000

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES INVESTOR PROTECTION
CORPORATION,**

Plaintiff-Applicant,

v.

**BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,**

Defendants.

Case No. 08-1789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

**In re BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,**

Debtor.

**IRVING L. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC,**

Plaintiff,

v.

Case No. 11-CV-06677 (JSR)

**ALPHA PRIME FUND LIMITED, and
SENATOR FUND SPC,**

Defendants.

**NOTICE OF MOTION OF ANDERSON KILL P.C.
TO WITHDRAW AS COUNSEL TO DEFENDANTS
ALPHA PRIME FUND, LTD. AND SENATOR FUND SPC.**

PLEASE TAKE NOTICE, that at a time and date to be determined by the Court, Anderson Kill P. C., will move before the Honorable Jed S. Rakoff, United States District Judge at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY to withdraw as counsel to Defendants Alpha Prime Fund, Ltd. and Senator Fund SpC (the "Motion").

PLEASE TAKE FURTHER NOTICE that, in support of the Motion, Anderson Kill P.C. shall rely upon the accompanying Memorandum of Law in Support of the Motion, the Declaration of Dennis J. Nolan in support of the Motion and the proposed order annexed hereto.

Dated: New York, New York
October 2, 2013

Respectfully submitted,

ANDERSON KILL P.C.

By: *Dennis J. Nolan*

Dennis J. Nolan
Luma al-Shabib
Beth D. Simon
1251 Avenue of the Americas
New York, New York 10020
(212) 278-1000
(212) 278-1733 (Fax)

EXHIBIT A

Dennis J. Nolan, Esq.
Luma al-Shabib, Esq.
Beth D. Simon, Esq.
ANDERSON KILL P.C.
1251 Avenue of the Americas
New York, New York 10020
(212) 278-1000

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION,	Plaintiff-Applicant,	Case No. 08-1789 (BRL)
v.		SIPA LIQUIDATION
BERNARD L. MADOFF INVESTMENT SECURITIES LLC,		(Substantively Consolidated)
	Defendants.	
In re BERNARD L. MADOFF INVESTMENT SECURITIES LLC,	Debtor.	
IRVING L. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,		
	Plaintiff,	
v.		Case No. 11-CV-06677 (JSR)
ALPHA PRIME FUND LIMITED, and SENATOR FUND SPC,		
	Defendants.	

**ORDER GRANTING APPLICATION OF ANDERSON KILL P.C.
TO WITHDRAW AS COUNSEL TO DEFENDANTS ALPHA PRIME FUND, LTD. AND
SENATOR FUND SPC.**

Upon the application (the “Application”) of Anderson Kill P.C. (“AK”), counsel to Defendants Alpha Prime Fund, Ltd. and Senator Fund SpC for entry of an order authorizing AK to withdraw as counsel; and due and proper notice of the Application having been given; and it appearing that no other or further notice is required; and upon consideration of the Application and all pleadings related thereto; and no objection to the Application having been made, and sufficient cause having been shown therefore; it is hereby:

ORDERED that the Application is GRANTED.

Dated: New York, New York
October ___, 2013

Honorable Jed S. Rakoff